

MICHAEL DONAHOE  
Senior Litigator  
Federal Defenders of Montana  
Helena Branch Office  
50 West 14<sup>th</sup> Street, Suite 300  
Helena, Montana 59601  
Phone: (406) 449-8381  
Fax: (406) 449-5651  
Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF MONTANA**  
**HELENA DIVISION**

UNITED STATES OF AMERICA,  Plaintiff,  vs.  WILLIAM FREDERICK SCHROEDER,  Defendant.	<b>Case No. CR 13-09-H-DLC</b>  DEFENDANT SCHROEDER'S MOTION TO CHANGE PLEA FROM NOT GUILTY TO GUILTY; MOTION TO VACATE JULY 1, 2013 TRIAL DATE
---	---

COMES NOW defendant William Frederick Schroeder (Schroeder), by and through his undersigned counsel, and respectfully advises that he has reached a plea agreement with the United States. The Agreement involving defendant's intention to plead guilty to Count II of the Indictment which charges the crime of receipt of child pornography in violation of 18 U.S.C. §2252(a)(2) has been signed by the

defendant, his counsel and government counsel and has been filed with the Court.

The plea agreement need not be filed under seal.

Based on the foregoing notice of intention, defense counsel requests that the Court set down a convenient time for change of plea and vacate the trial set for July 1, 2013.

RESPECTFULLY SUBMITTED June 17, 2013.

/s/ Michael Donahoe  
MICHAEL DONAHOE  
Senior Litigator  
Federal Defenders of Montana  
Counsel for Defendant

**CERTIFICATE OF SERVICE**  
**L.R. 5.2(b)**

I hereby certify that on June 17, 2013, a copy of the foregoing document  
was served on the following persons by the following means:

  1         CM-ECF

  2         Mail

1.     CLERK, UNITED STATES DISTRICT COURT

1, 2.   Joseph E. Thaggard  
       Ole Olson  
       Assistant U.S. Attorney  
       901 Front Street, Suite 1100  
       Helena, MT 59626-1100  
       Counsel for the United States of America

      /s/ Michael Donahoe        
MICHAEL DONAHOE  
Senior Litigator